

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

615 RIVER ROAD PARTNERS, LLC, a
Delaware limited liability
company,

Plaintiff,

vs.

BOROUGH OF EDGEWATER, a municipal
corporation of the State of New
Jersey, and JOHN DOES and JANE
DOES Nos. 1-100,

Defendants.

Civil Action No.
2:17-cv-12659-JMV-CLW

NOTICE OF MOTION
TO DISMISS PLAINTIFF'S
COMPLAINT PURSUANT TO
FED. R. CIV. PRO.
12(b)(1) AND
12(b)(6)

(ORAL ARGUMENT IS
REQUESTED)

To: Justin P. Walder, Esq.
Roger Plawker, Esq.
David N. Cinotti, Esq.
PASHMAN STEIN WALDER
HAYDEN, P.C.
Court Plaza South
21 Main Street, Suite 200
Hackensack, NJ 07601

Cory Mitchell Gray, Esq.
Theodore J. McEvoy, Esq.
GREENBERG TRAURIG, LLP
500 Campus Drive
Suite 4009
Florham Park, NJ 07932

PLEASE TAKE NOTICE that on May 7, 2018 at 9:00 a.m. or as soon thereafter as counsel may be heard, the undersigned attorneys for defendant Borough of Edgewater, will appear before the Honorable John Michael Vazquez, U.S.D.J., at the United States District Court, Martin Luther King, Jr. Federal Building & U.S. Courthouse, 50 Walnut Street, Courtroom 4C, Newark, New Jersey 07101, for an Order Dismissing Plaintiff's Complaint pursuant to Fed. R. Civ. Pro. 12(b)(1) and 12(b)(6).

PLEASE TAKE FURTHER NOTICE that in support of said Motion, the undersigned shall rely upon the accompanying Brief and Affidavit of John A. Stone, Esq.

PLEASE TAKE FURTHER NOTICE that a Certification of Service and proposed form of Order are annexed hereto.

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

**DECOTIIS, FITZPATRICK, COLE &
GIBLIN, LLP**

Attorney for Defendants

By: s/John A. Stone
John A. Stone
Glenpointe Centre West
500 Frank W. Burr Blvd.
Ste. 31
Teaneck, NJ 07666
(201) 928-1100

Dated: April 9, 2018

CERTIFICATION OF SERVICE

I hereby certify that on April 9, 2018, I caused defendants' Notice of Motion, Brief, Certification of John A. Stone, Esq. and proposed Order to be filed via CM/ECF filing.

Copies of all documents were also served, via CM/ECF filing and regular mail on

Justin P. Walder, Esq.
Roger Plawker, Esq.
David N. Cinotti, Esq.
PASHMAN STEIN WALDER HAYDEN, P.C.
Court Plaza South
21 Main Street, Suite 200
Hackensack, NJ 07601

Cory Mitchell Gray, Esq.
Theodore J. McEvoy, Esq.
GREENBERG TRAURIG, LLP
500 Campus Drive
Suite 4009
Florham Park, NJ 07932

**DECOTIIS, FITZPATRICK, COLE &
GIBLIN, LLP**
Attorney for Defendants

By: s/John A. Stone
John A. Stone
Glenpointe Centre West
500 Frank W. Burr Blvd.
Ste. 31
Teaneck, NJ 07666
(201) 928-1100

Dated: April 9, 2018